Kevin Haverty, Esq., pro hac vice WILLIAMS CUKER BEREZOFSKY, LLC 210 Lake Drive East, Suite 101 Cherry Hill, NJ 08002

Tel: 856-667-0500 Fax: 856-667-5133

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

Stephen Wendell, and Lisa Wendell, for themselves and as successors in interest to Maxx Wendell, deceased

Plaintiff(s),

v. Johnson & Johnson, et al.

Defendant(s).

CASE NO. C 09-04124 CW

Hearing Date: Thursday, June 13, 2013

Hearing Time: 9:00 a.m.

Hearing Location: Courtroom F, 15th Floor, 450 Golden Gate Ave.

San Francisco, CA 94102

Response Date: Monday, May 20, 2013 Reply Date: Tuesday, May 28, 2013

NOTICE OF MOTION FOR PROTECTIVE ORDER FIXING THE PLACE FOR DEPOSITION OF DEFENDANT TEVA'S 30(b)(6) WITNESS

TAKE NOTICE that Plaintiffs hereby move for a Protective Order, pursuant to *Fed. R. Civ. P.* 26(c)(1)(B) requiring the deposition of defendant Teva's 30(b)(6) witness take place in San Francisco in the Magistrate Judge's courtroom (or other location deemed appropriate by the court).

Plaintiffs will rely upon the attached Declaration of Counsel in support of this motion.

1

NOTICE OF MOTION FOR PROTECTIVE ORDER FIXING THE PLACE FOR DEPOSITION OF DEFENDANT TEVA'S 30(b)(6) WITNESS

A proposed form of Order is attached.

Respectfully submitted,

WILLIAMS CUKER BEREZOFSKY, LLC

BY: /s/ Kevin Haverty
KEVIN HAVERTY, pro hac vice
Khaverty@wcblegal.com
210 Lake Drive East, Suite 101
Cherry Hill, New Jersey 08002
Tel (856) 667-0500
Fax (856) 667-5133
Counsel for Plaintiffs